

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

PRESIDENT DONALD J. TRUMP, 45th President of the United States of America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New York corporation,
ROBERT WOODWARD p.k.a. BOB WOODWARD, an
individual, and PARAMOUNT GLOBAL, a Delaware
corporation, f/k/a Viacom Inc., successor by merger to CBS
Corporation, a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,

Defendants.

3:23-cv-02333-RV-ZCB

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTIONS TO DISMISS

Plaintiff, President Donald J. Trump, 45th President of the United States of America, in his individual capacity (“Plaintiff”), respectfully submits this unopposed motion to extend the time to oppose the two motions to dismiss filed by the Defendants, Simon & Schuster, Inc.; Robert Woodward; and Paramount Global (“Defendants”) in this matter, and in support thereof states as follows.

1. On May 19, 2023, the Defendants filed their (i) Motion to Dismiss Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and (ii) Motion to Dismiss, or in the Alternative, to Transfer for Improper Venue (collectively, the “Motions”). (ECF. Nos. [37] and [38].

2. Pursuant to this Court's Order dated May 4, 2023, the Plaintiff's current deadline to respond to the Motions is June 16, 2023. (ECF No. [34])

3. Due to a medical situation that arose relating to counsel, additional time is required to finalize the responses to the two Motions. For that reason, Plaintiff respectfully requests that this Honorable Court extend Plaintiff's deadline to respond to the Motions by fourteen (14) days, through June 30, 2023.

4. Undersigned counsel has conferred with counsel for the Defendants, and the latter has consented to the subject extension.

For the reasons set forth above, Plaintiff respectfully submits this unopposed motion seeking entry of an order granting Plaintiff's request to extend his time to respond to the Motions up to and including June 30, 2023, and for entry of any other relief the Court deems appropriate.

LOCAL RULE 7.1(B) CERTIFICATION

The undersigned counsel hereby certifies that prior to filing the instant motion, the undersigned counsel conferred with counsel for the Defendants, and counsel agreed to the relief requested herein.

Dated: June 13, 2023
Aventura, Florida

GS2 LAW PLLC

By: /s/ Robert Garson
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2023, I filed the foregoing Unopposed Motion, which will send an electronic notice to counsel of record per the service list below.

/s/ Robert Garson

Service List

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